

The NT Global Bond 1-5 Years ESG Climate Index Fund

Supplement dated 14 August 2023 to the Prospectus dated 14 August 2023 for Northern Trust Investment Funds plc

The NT Global Bond 1-5 Years ESG Climate Index Fund

This Supplement contains specific information in relation to The NT Global Bond 1-5 Years ESG Climate Index Fund (the "Fund"), a Fund of Northern Trust Investment Funds plc (the "Company") an open-ended investment company with variable capital established as an umbrella fund with segregated liability between Funds governed by the laws of Ireland and authorised by the Central Bank of Ireland (the "Central Bank").

This Supplement forms part of and should be read in conjunction with the Prospectus.

*The Directors of the Company, whose names appear in the **Management and Administration** section of the Prospectus, accept responsibility for the information contained in the Prospectus, this Supplement and the Annex. To the best of the knowledge and belief of the Directors (who have taken all reasonable care to ensure that such is the case) such information is in accordance with the facts and does not omit anything likely to affect the import of such information. The Directors accept responsibility accordingly.*

Words and expressions defined in the Prospectus shall, unless the context otherwise requires, or as otherwise provided herein, have the same meaning when used in this Supplement.

The Fund meets the criteria pursuant to Article 8 of the Sustainable Finance Disclosure Regulation (Regulation EU/2019/2088) as amended ("SFDR") to qualify as a financial product which promotes, among other characteristics, environmental or social characteristics, or a combination of those characteristics and provided that the companies that the Fund invests in follow good governance practices. Please refer to the Annex appended hereto which has been prepared for the purpose of meeting the specific financial product level disclosure requirements contained in SFDR applicable to an Article 8 Fund.

An investment in the Fund should not constitute a substantial proportion of an investment portfolio and may not be appropriate for all investors.

A typical investor is prepared to accept a degree of low volatility. A typical investor will be seeking to achieve exposure to investment grade bonds and will be seeking to achieve a return on investment in the short to medium term.

Investment in the Fund may be appropriate for professional or retail investors who have knowledge of, and investment experience in, this particular financial product and understand and can evaluate the strategy,

characteristics and risks in order to make an informed investment decision. This Fund is passively managed.

The Fund may invest in financial derivative instruments ("FDI") for hedging and efficient portfolio management ("EPM") purposes (as detailed below). See below section titled "Borrowing and Leverage" for details of the leverage effect of investing in FDI.

INVESTMENT OBJECTIVE AND POLICIES

Investment Objective

The investment objective of the Fund is to track the risk and return characteristics of the Solactive Global Bond 1-5 Years ESG Climate Index (the "**Index**").

Any change of Index shall only be made with the prior approval of the Shareholders.

Investment Policies

The Fund seeks to achieve its investment objectives through investment primarily in freely transferable Debt and Debt Related Securities including investment grade bonds that are constituents of the Index as described further below in the section titled "**Index Description**". The Fund may also invest in investment grade bonds that are not included in the Index that are deemed by the Investment Manager to exhibit similar characteristics to securities in the Index and that have a similar risk profile, examples include: recently issued securities that are expected to be included in the Index; securities that have previously been included in the Index and have been deleted due to maturity falling below one year; and, securities that have previously been included in the Index and have been deleted due to an increase in the par amount eligibility threshold of the Index. Investment in such securities will, in all cases, be consistent with the investment objective of the Fund. The bonds which may be fixed or floating rate in which the Fund invests will be investment grade quality at the time of purchase and, although in practice they may be purchased or sold by the Investment Manager on the secondary market, they and all other securities, including exchange traded FDI, in which the Fund may invest (other than permitted unlisted securities) will be listed or traded on a Market within the list in Appendix I of the Prospectus. The Fund may invest in mortgage and asset-backed securities for which the pools of underlying assets may directly include commercial, residential, consumer loans or trade receivables but shall not invest in collateralised loan obligations, collateralised mortgage obligations or collateralised debt obligations. The average credit rating of the Fund's assets will be approximate to the average credit rating of the Index.

The Fund may invest in FDI for EPM purposes and may be fully or partially hedged back to the Base Currency in accordance with the powers and restrictions set out by the Central Bank in relation to techniques for efficient portfolio management purposes as further disclosed in the **Efficient Portfolio Management, Financial Derivative Instruments and Securities Financing Transactions** section of the Prospectus. The Fund may invest in FDI as set out in the section titled "**Use of Efficient Portfolio Management Techniques and Financial Derivative Instruments**" below.

The Fund may also invest (up to 10% of its Net Asset Value) indirectly in Debt and Debt Related Securities comprised within the Index through holdings in open-ended collective investment schemes ("**CIS**") (including UCITS exchange traded funds ("**ETFs**")). Any such CIS shall be listed/traded on Regulated Markets and will have investment objectives which are materially similar to the Fund.

The Fund may also invest in the China Interbank Bond Market (CIBM) via the arrangement between Hong Kong and the People's Republic of China (PRC) that enables Chinese and overseas investors to trade various types of debt securities in each other's bond markets through connection between the

relevant respective financial infrastructure institutions (Bond Connect).

Index Tracking Strategy

The Fund operates an index tracking strategy whereby it seeks to track the risk and return characteristics of the Index through the investment directly in assets that are Index constituents (i.e. a physical replication model). However, the Fund does not seek to fully replicate the Index but instead seeks to match the Fund's investments with Index constituents on a sample based physical replication model within the scope of the general UCITS investment restrictions and the specific investment restrictions set out below. Therefore, the weighting of a constituent of the Index held by the Fund cannot exceed the permitted investment restrictions. Accordingly, investment in the Fund should not be considered to provide a direct exposure to the Index. In normal market conditions, the Fund can be expected to closely match the performance of the Index. However, in normal market conditions, since the Fund does not seek to fully replicate the Index, an annualised ex-post Tracking Error of 0.10% - 0.20% should be anticipated due to transaction costs and the liquidity impact of the Fund's sampling approach. Employing a sampling approach (rather than full replication approach) necessarily results in individual security overweights and underweights relative to the Index, as the Fund will not hold every Index constituent but will strive to achieve representative exposure to the more liquid securities and sectors of the Index which are available for purchase.

As the Fund does not pursue a synthetic index replication strategy, there is no corresponding counterparty risk related to the index replication strategy.

Index Description

The Index is a global benchmark to measure the performance of worldwide bonds issued by central government, government-related, corporates and securitised debt securities with a fixed rate such as asset backed securities and mortgage backed securities. The benchmark is designed to provide a broad coverage of local currency debt from developed and emerging markets according to Solactive's Bond Market Classification. All the bonds have an investment grade rating by either S&P or Moody's. For government issuers the country's issuer rating is relevant for inclusion.

For the corporate securities, the Index then applies a series of exclusions based on Sustainalytics data pursuant to Northern Trust's objective and pre-determined environmental, social and governance ("**ESG**") criteria. It is confirmed that the performance of the Index is calculated in an independent environment, free from any external influences in which the Investment Manager has no role. Factoring in the ESG criteria as further detailed in the Annex means that certain companies shall be excluded from the Index.

For issuers domiciled in emerging markets, an additional governance screen is applied and companies that do not meet the following criteria are ineligible - companies with scores that fall below the emerging market company average in the corporate governance categories of board structure, ownership & shareholder rights, remuneration, and audit & financial reporting. The Northern Trust ESG Vector Score will then be applied to ensure an uplift in the overall sustainability profile of the index. The Northern Trust ESG Vector Score is a measurement that assesses publicly traded companies in the context of financially relevant ESG related criteria that could impact a company's operating performance. It marries two

leading sustainability reporting frameworks; the Sustainability Accounting Standards Board's (SASB) Standards, which are industry-specific sustainability disclosure standards focused on financial materiality, and the thematic structure of the Task Force on Climate-related Financial Disclosures' (TCFD) recommendations. It applies TCFD's anticipatory framework on governance, strategy and risk management, beyond simply climate, to all financially material ESG risks across the SASB Standards, resulting in a comprehensive risk assessment. Additionally, the Northern Trust ESG Vector Score places a further emphasis on corporate governance because of the impact it can have on long-term value. The Index then seeks to (i) reduce carbon intensity, using ISS intensity data in tonnes CO2/\$ million Enterprise Value Including Cash (EVIC); and (ii) uplift the portfolio's carbon risk profile, using the ISS Carbon Risk Rating (the "ISS CRR"). The ISS CRR combines a Carbon Risk Classification, which assesses a company's exposure to carbon transition risk, and a Carbon Performance Score which assesses a company's current carbon performance and its initiatives to reduce carbon intensity in the future.

For government securities, the Index will systematically integrate fiscal strength and governance metrics by the application of country level fiscal strength scores (based on Debt/GDP, Deficit/GDP, CAB/GDP) and governance scores (based on World Bank Governance Indicators (WGI)) to maximise a combined fiscal strength plus governance score ("FWS+G") of the Index. Using data from the European Commission's Emissions Database for Global Atmospheric Research, country level carbon measures will then be applied to reduce carbon impact and mitigate the risk of climate change.

Following the ESG integration into the corporate and government securities, risk will be controlled by applying liquidity and turnover constraints and limiting the weights of securities, exposure by sub-industry, region and country, as well as exposures to other risk factors.

Further details of the Index please refer to <https://www.solactive.com/indices/?se=1&index=DE000SL0BT F1#detail>.

Further details on the Northern Trust Vector Score can be found at <https://landing.northerntrust.com/esg-vector-score/p/1>.

Further details on Sustainalytics can be found at <https://www.sustainalytics.com/>.

Further details on ISS can be found at <https://www.issgovernance.com/esg/climate-solutions/>.

INVESTMENT RESTRICTIONS

The general investment restrictions set out under the heading **Investment Restrictions** in the Prospectus shall apply.

USE OF EFFICIENT PORTFOLIO MANAGEMENT TECHNIQUES AND FINANCIAL DERIVATIVE INSTRUMENTS

The Fund may use forwards, TBAs and exchange traded funds for EPM and hedging purposes as further described in the Prospectus.

Further details of the techniques and instruments that the Fund may employ for EPM purposes are set out in the **Efficient**

Portfolio Management, Financial Derivative Instruments and Securities Financing Transactions section of the Prospectus.

Collateral or margin may be passed by the Fund to a counterparty or broker in respect of Efficient Portfolio Management Techniques. Please refer to the section of the Prospectus entitled **Collateral Policy** for further details.

The use of FDI for the purposes outlined above may expose the Fund to the risks disclosed under the section of the Prospectus titled **Risk Factors**.

BOROWINGS AND LEVERAGE

The Fund may borrow up to 10% of its Net Asset Value on a temporary basis.

Global exposure and leverage as a result of its investment in FDI as described above shall not exceed 100% of the Net Asset Value of the Fund. Global exposure will be measured using the commitment approach.

RISK FACTORS

In addition to the general risk factors set out in the **Risk Factors** section of the Prospectus, the following additional risk factors apply specifically to the Fund:

Liquidity Risk
Reinvestment of Cash Collateral Risk
Economic Factors
Derivatives and Securities Financing Transactions Risk
Sanctions
Investing through Bond Connect

INVESTMENT MANAGER AND SUB-INVESTMENT MANAGER

The Manager has appointed Northern Trust Global Investments Limited as the Investment Manager of the Fund. The Investment Manager has appointed Northern Trust Investments, Inc as the sub-investment manager of the Fund.

DIVIDEND POLICY

Accumulating Shares

No dividends will be declared in respect of the Accumulating Shares.

Distributing Shares

In respect of the Distributing Shares, the Directors intend to declare and pay all net income of the Fund attributable to each class annually as a dividend to the Shareholders of each relevant class of Shares on the register of members as at the close of business on the relevant Dealing Day.

Further details on the distribution policy are set out in Prospectus under the heading **Dividend Policy**.

KEY INFORMATION FOR BUYING AND SELLING

Share Classes

Shares may be issued as Accumulating Shares or (where specifically identified as such) Distributing Shares.

Base Currency

U.S. Dollar

Business Day

Any day (except Saturday or Sunday) on which the banks in Ireland are open generally for business, or such other day as the Directors may determine and notify to Shareholders.

Dealing Day

The Dealing Day for the Fund will be every Business Day or such other day or days as the Directors may determine and notify in advance to Shareholders, provided that there shall be at least one Dealing Day per fortnight. In determining whether a day should be treated as a Dealing Day, the Directors may take into account whether there are sufficient market exchanges open as determined by the Investment Manager to allow the normal liquidity trading of the portfolio.

The Investment Manager maintains a list of any non-Dealing Days on the Website.

Dealing Deadline

In respect of a Dealing Day, the Dealing Deadline is 3.00 p.m. (Irish time) on the day before the relevant Dealing Day. Any applications received after the Dealing Deadline for a Dealing Day will be processed on the next Dealing Day unless the Directors in their absolute discretion, in exceptional circumstances, otherwise determine to accept one or more applications received after the Dealing Deadline for processing on that Dealing Day provided that such request(s) have been received prior to the Valuation Point for the particular Dealing Day.

Initial Offer Period

The Initial Offer Period in respect of A GBP Hedged Accumulating, A GBP A Hedged Distributing, B GBP Hedged Accumulating, B GBP Hedged Distributing and B EUR Accumulating has closed.

The Initial Offer Period in respect of all other Share Classes will commence at 9.00 a.m. (Irish time) on 15 August 2023 and will continue until 5.00 p.m. (Irish time) on 13 February 2024 or such earlier or later date as the Directors may determine.

After the Initial Offer Period, the Fund will be continuously open for subscriptions on each Dealing Day.

Settlement Date

In the case of applications, proceeds must be received no later than two Business Days after the relevant Dealing Day or as otherwise determined by the Manager.

In the case of repurchases, proceeds must be remitted to investors no later than two Business Days after the relevant Dealing Day (assuming the receipt of the relevant duly signed repurchase documentation) or as otherwise determined by the Manager provided that in all cases proceeds are paid within ten Business Days.

Preliminary Charge

There will be no Preliminary Charge for this Fund.

Repurchase Charge

There is no Redemption Charge for this Fund.

Anti-Dilution Levy

The Directors or the Manager (or their duly appointed delegate)

may impose a swing pricing adjustment as further detailed in the Prospectus in the section entitled **Anti-Dilution Levy**.

Valuation Point

With respect to: (i) currencies and currency-related transactions only, 4pm (London time); and (ii) all other assets, the close of business of the relevant market that closes last on each Dealing Day, which in all cases shall be after the Dealing Deadline.

Initial Issue Price

For Euro denominated share classes €100 per Share, for US Dollar denominated share classes \$100 per Share, for Sterling denominated share classes, £100 per Share.

Classes of Shares Available

A, B, C, D, E, F, G, H, I, J, K

Each of the above referenced Share Classes are available as Accumulating Shares and Distributing Shares.

Currencies Available

Each of the Share Classes are available in Euro, Sterling and U.S. Dollar.

Currency Hedged Share Classes

Each Share Class is available as either a hedged or an unhedged Share Class.

Minimum Shareholding

€100,000 (or its equivalent in the relevant Share Class currency) subject to the discretion of the Directors to allow lesser amounts.

Minimum Initial Investment Amount

In respect of Share Class B, GBP 100 million (or the equivalent in EUR, USD) subject to the discretion of the Directors to allow lesser amounts.

In respect of all other Share Classes, €100,000 (or its equivalent in the relevant Share Class currency) subject to the discretion of the Directors to allow lesser amounts.

FEES AND EXPENSES

Fees and Expenses of the Manager, the Investment Manager, the Depositary, any sub-custodian and the Administrator

The Investment Manager is entitled to receive out of the assets of the Fund an annual fee of up to 0.50% of the Net Asset Value of the Fund. Such fee shall accrue and be calculated on each Dealing Day and be payable monthly in arrears. The Investment Manager shall also be entitled to be reimbursed out of the assets of the Fund for the reasonable out-of-pocket expenses incurred by the Investment Manager in the performance of its duties. The Investment Manager will pay out of the above fee (and not out of the assets of the Fund) the fees of the Sub-Investment Manager.

The Manager shall not receive a fee but shall be entitled to be reimbursed out of the assets of the Fund for the reasonable out-of-pocket expenses incurred in the performance of its duties.

The Administrator shall be entitled to receive out of the Net Asset Value of the Fund an annual fee, accrued and calculated on each Dealing Day and payable monthly in arrears at an annual rate which will not exceed 0.05% of the Net Asset Value of the Fund (plus VAT, if any). The

Administrator is entitled to be repaid out of the assets of the Fund all of its reasonable agreed upon transaction and other charges (which will be at normal commercial rates) and other out-of-pocket expenses (plus VAT thereon, if any).

The Depositary shall be entitled to receive out of the Net Asset Value of the Fund an annual fee, accrued and calculated on each Dealing Day and payable monthly in arrears, at an annual rate which will not exceed 0.05% of the Net Asset Value of the Fund (plus VAT thereon, if any).

The Depositary is also entitled to be repaid out of the assets of the Fund sub-custodian's fees (which will be charged at normal commercial rates) as well as agreed upon transaction charges (which will be at normal commercial rates) and other out-of-pocket expenses (plus VAT thereon, if any).

In addition to the fees outlined above, the Fund will also be responsible for the fees of Hermes EOS (for its services in respect of the Fund, as described in the Prospectus), up to 0.02% of the Net Asset Value of the Fund per annum. Such fee shall accrue and be calculated on each Dealing Day and be payable quarterly in arrears.

This section should be read in conjunction with the section entitled **Fees and Expenses of the Funds** in the Prospectus.

Establishment costs

The organisational and establishment costs relating to the creation of the Fund have been fully amortised by the Fund.

MISCELLANEOUS

Reporting

Some Shareholders may receive additional information and/or reports in relation to the Fund on a frequent basis. Any such information will be available to all investors in the Fund on request. Any such information will only be provided on a historical basis and after the relevant Dealing Day to which the information relates. Please contact your relationship manager to discuss any reporting needs.

Other Funds

The other Funds of the Company are listed in the Global Supplement to the Prospectus.

New Funds may be created from time to time by the Directors with the prior approval of the Central Bank in which case further Supplements incorporating provisions relating to those Funds will be issued by the Company.

Product name:
The NT Global Bond 1-5 Years ESG Climate Index Fund
("the Product")

Legal entity identifier:
635400WXZLZEUDYCX32

Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?	
Yes	No
<input type="checkbox"/> It will make a minimum of sustainable investments with an environmental objective: __% <ul style="list-style-type: none"> <input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy <input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy <input type="checkbox"/> It will make a minimum of sustainable investments with a social objective: __%	<input type="checkbox"/> It promotes Environmental/Social (E/S) characteristics and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 10% of sustainable investments <ul style="list-style-type: none"> <input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy <input type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy <input type="checkbox"/> with a social objective <input type="checkbox"/> It promotes E/S characteristics, but will not make any sustainable investments

What environmental and/or social characteristics are promoted by this financial product?

The Product has the following environmental and/or social ("E/S") characteristics (i) a fiscal strength and governance score (based on Debt/GDP, Deficit/GDP, CAB/GDP metrics and World Bank Governance Indicators which is applied to government bonds by reweighting country allocations based on the scores; (ii) the NT Custom ESG screening criteria and the Northern Trust ESG Vector Score™ (a measurement that assesses publicly traded companies in the context of financially relevant environmental, social and governance (ESG) related criteria that could impact their operating performance) which are both applied to corporate bonds; (iii) carbon reduction targets to both the government (carbon emissions, carbon intensity and carbon trend at country level) and corporate bonds (carbon emissions and carbon risk rating uplift) to mitigate climate change relative to Solactive Global Bond 1-5 Years ESG Climate Index (the "Index"). As its investment strategy, the product seeks to track the risk and return characteristics of the Index - by investing directly in assets that are Index constituents – by using a sample based physical replication model. For the corporate securities, the Index is constructed using the NT Custom ESG screening criteria on the Index to be in line with international norms and specific ESG criteria.

Please refer to the sustainability indicators stated below for further detail.

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.



Sustainability indicators measure how the environmental or social characteristics promoted by the financial product are attained.

What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?

Below is a list of sustainability indicators used to measure the attainment of the environmental and/or social characteristics promoted by this product using the NT Custom ESG screening:

- i) companies that breach global norms such as UN's Global Compact Ten Principles due to being involved in controversies classified as "very severe" in the areas of Environment, Human Rights and Community, Labour Rights and Supply Chain, or Governance. For further details on the UN Global Compact Ten Principles, please refer to www.unglobalcompact.org/aboutthegc/thetenprinciples/ind ex.html
- ii) companies that derive any revenue from the production of tobacco, or 5% or more of their revenue from the distribution of tobacco, supply of key products for the production of tobacco, or the retail of tobacco;
- iii) companies that manufacture controversial weapons, such as cluster bombs, landmines, nuclear weapons, depleted uranium weapons, biological/chemical weapons, (or their strategic components), blinding laser, non-detectable components, or incendiary weapons;
- iv) companies that manufacture civilian firearms or retail civilian firearms and derive 5% or more revenue from this sector;
- v) companies that manufacture conventional weapons or derive 5% or more revenue from weapons sales or from military contracting;
- vi) companies that derive 5% of revenue or more from thermal coal mining;
- vii) companies that derive 30% or more revenue from coal-fired power generation or 5% or more revenue if their transition risk preparedness or carbon management is considered weak;
- viii) companies that derive 5% or more revenue from unconventional oil and gas such as oil sands and shale gas or 1% or more revenue from arctic oil and gas and their management of carbon in their own operations is assessed as weak;
- ix) companies that derive 5% or more revenue from for profit prisons.

referred to hereafter as the "NT Custom ESG screening criteria".

This methodology is reviewed annually. These sustainability indicators are non-exhaustive and subject to change.

Also for the corporate securities, Northern Trust ESG Vector Score™ will then be applied to ensure an uplift in the overall sustainability profile of the Index. The Northern Trust ESG Vector Score™ is a measurement that assesses publicly traded companies in the context of financially relevant ESG related criteria that could impact a company's operating performance.

To reduce the carbon footprint and other negative externalities, the Product aims within the corporate holdings of the portfolio, to reduce the operational carbon intensity of the portfolio (weighted average carbon intensity based on tons of CO₂e/\$M sales); and therefore have a lower carbon footprint relative to the Index.

For government securities, the Index will systematically integrate fiscal strength and governance metrics by the application of country level fiscal strength scores (based on Debt/GDP, Deficit/GDP, CAB/GDP) and governance scores based on (based on World Bank Governance Indicators (WGI)) to maximise a combined fiscal strength plus governance score ("FWSG") of the Index. Using data from the European Commission's Emissions Database for Global Atmospheric Research, country level carbon measures will then be applied to reduce carbon impact and mitigate the risk of climate change.

The Investment Manager shall also ensure that any investments made by the Product are in accordance with rules regarding cluster munitions laid down in the relevant national legislation adopting the Convention on Cluster Munitions.

Hermes EOS has been appointed to carry out corporate engagement with carefully selected companies held within the Product. Please refer to the Prospectus for further detail on this appointment.

What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?

The intended objectives of the sustainable investments are to positively contribute towards any of the environmental objectives defined by the data provider and as listed below. Our definition of positive contribution includes minimum percentage revenues deriving from activities linked with these objectives alongside companies assessed to have credible carbon reduction targets such as The Science Based Targets Initiative ("SBTI").

- alternative energy (renewables),
- energy efficiency,
- green building,
- sustainable water,
- pollution prevention and
- sustainable agriculture.

Investments in these areas help contribute towards the product's environmental objectives, specifically climate change mitigation and climate change adaptation objectives.

How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?

In order to deem an investment a sustainable investment, it must not only satisfy the positive contribution test, but also a 'do no significant harm' ("DNSH") test designed to ensure that no significant harm is caused to any environmental or social investment objective.

Our assessment of harm involves the use of a set of diverse environmental and social indicators for example, greenhouse gas emissions ("GHG"), carbon footprint, GHG intensity of investee companies etc. coupled with our own proprietary thresholds. These thresholds represent a value or metric at which we believe there is a risk of significant harm. In practice, this means that an investee company can only be deemed a sustainable investment under our definition if it a) meets our minimum positive contribution test; b) the indicators for harm are under the proprietary thresholds set at specific points in time and lastly c) that investee companies follow good governance practices and are aligned with minimum safeguards such as Organisation for Economic Cooperation and Development ("OECD") guidelines for Multinational Enterprises.

- How have the indicators for adverse impacts on sustainability factors been taken into account?

The Product considers adverse impacts through a range of criteria that form part of the investment strategy; the NT Custom ESG Screening criteria, application of ESG metrics to maximise the ESG scores and carbon emissions reduction targets. This provides a strong ethical foundation in line with international norms and are regularly updated following our own research, as well as feedback from our clients. Added to this, we have secured access to a range of ESG data providers and datasets to help us to carry out this assessment and ongoing monitoring.

For sustainable investments specifically, and as described above, our assessment of harm involves the use of a set of diverse environmental and social indicators with proprietary thresholds.

Lastly, consideration of adverse impacts form part of our focused engagement and voting activities designed to help influence the business models of investee companies to transition to a more sustainable future.

Principal adverse impacts are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

- ***How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:***

The Product applies the NT Custom ESG screening criteria to identify and exclude companies that do not adhere to international norms – such as:

- OECD Guidelines for Multinational Enterprises;
- the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation (“ILO”) on Fundamental Principles and Rights at Work; and
- the International Bill of Human Rights.

The implementation of these exclusions happens through the use of third party controversy data used as a proxy to assess the negative environmental, social and governance impact of a company’s operations, products and services.

In practice, this means that all investee companies are aligned with these minimum safeguards, not only the sustainable investments.

The EU Taxonomy sets out a “do not significant harm” principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The “do no significant harm” principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.



Does this financial product consider principal adverse impacts on sustainability factors?

Yes

No

The Product considers as part of the investment strategy, the following principal adverse impact ("PAI") indicators in Annex 1, Table 1 Annex 1 of the SFDR Regulatory Technical Standards ("SFDR RTS").

PAI 1: GHG emissions (Scope 1 and Scope 2);

PAI 2: Carbon footprint;

PAI 3: GHG intensity;

PAI 4: Exposure to companies active in the fossil fuels sector;

PAI 10: Violations of UNGC principles and OECD Guidelines for Multinational Enterprises; and

PAI 14: Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons).

Lastly, adverse impacts also form part of our focused engagement and voting activity enabling us to identify where best to utilise resources for maximum social and/or environmental impact.



What investment strategy does this financial product follow?

The Product is a passive Index tracking strategy whereby it seeks to track the risk and return characteristics of the custom Index - Solactive Global Bond 1-5 Years ESG Climate Index by investing directly in assets that are Index constituents. The custom Index is calculated and screened by Solactive and integrates ESG and climate data into the sovereign and corporate sectors of the portfolio to increase the ESG profile and mitigate the risk of climate change compared to its Parent benchmark.

The investment strategy guides investment decisions based on factors such as investments objectives and risk tolerance.

What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?

The binding elements of the strategy used to promote the environmental or social characteristics form part of investible universe. The Product is managed against the Solactive Global Bond 1-5 Years ESG Climate Index which integrates ESG and climate data into the sovereign and corporate sectors of the portfolio to increase the ESG profile and mitigate the risk of climate change compared to its parent benchmark. ESG negative screening, maximising ESG scores and applying carbon reduction targets to the sovereign and corporate sectors of the Index are coded within the Index methodology.

Examples of the binding elements include the exclusion of a range of corporate bonds that:

- do not comply with UN Global Compact Principles;
- derive revenue from the production or distribution of tobacco;
- manufacture civilian firearms, controversial and conventional weapons;
- derive revenue from thermal coal power, thermal coal mining, unconventional oil and gas, for-profit prisons.

Examples of positive tilts that form part of the custom Index include the following:

- in relation to Government bonds - greater exposure than the Parent Index to countries as a result of maximising the country level fiscal strength scores and governance scores;
- in relation to corporate bonds - improved NT ESG Vector Scores™ than the parent benchmark as a result of maximising the NT ESG Vector Scores.™

Please refer to previous response to the question on “sustainability indicators” for a complete list of the NT Custom ESG screening criteria that form part of the Product’s binding criteria.

What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?

While the product’s investible universe is reduced as a result of the binding exclusions, it does not commit to a minimum reduction rate. As such, the reduction of the universe may be subject to change.

Good governance practices include sound management structures, employee relations, remuneration of staff and tax compliance.

What is the policy to assess good governance practices of the investee companies?

An assessment of good governance of sovereign and corporate sectors of the Index forms a foundational part of the Index methodology. In practice, this is achieved for corporate bonds through the use of the NT ESG Vector Score™ and the data provider's ESG Controversy screen, a proxy framework designed to address governance topics consistent with international norms represented by the UN Declaration of Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, the OECD Guidelines and the UN Global Compact. In order to produce the controversy, our chosen data provider assesses the negative environmental, social and governance impact of the investee companies operations, products and services. It also identifies breaches of international norms through the use of controversy proxies which are assessed based on the scale and severity of the controversy. For Sovereigns the governance part of the fiscal strength the governance score which is applied at country level measured by World Bank Worldwide Governance Indicators (WGI) methodology to measure quality of governance over sustainability issues.

Severity may vary depending on the nature of the controversy but generally includes metrics such as:

- the percent of shareholder votes or number of shareholders voicing an opinion,
- number and position of executives or directors involved,
- number and type of external parties voicing an opinion, or
- the portion of the company that is affected or implicated.

For other governance issues, scale is generally measured by:

- the length of time an activity was ongoing,
- the size of the market or government affected, or
- the scale on which either company executives or external parties such as government officials were involved.



Asset allocation describes the share of investments in specific assets.

What is the asset allocation planned for this financial product?

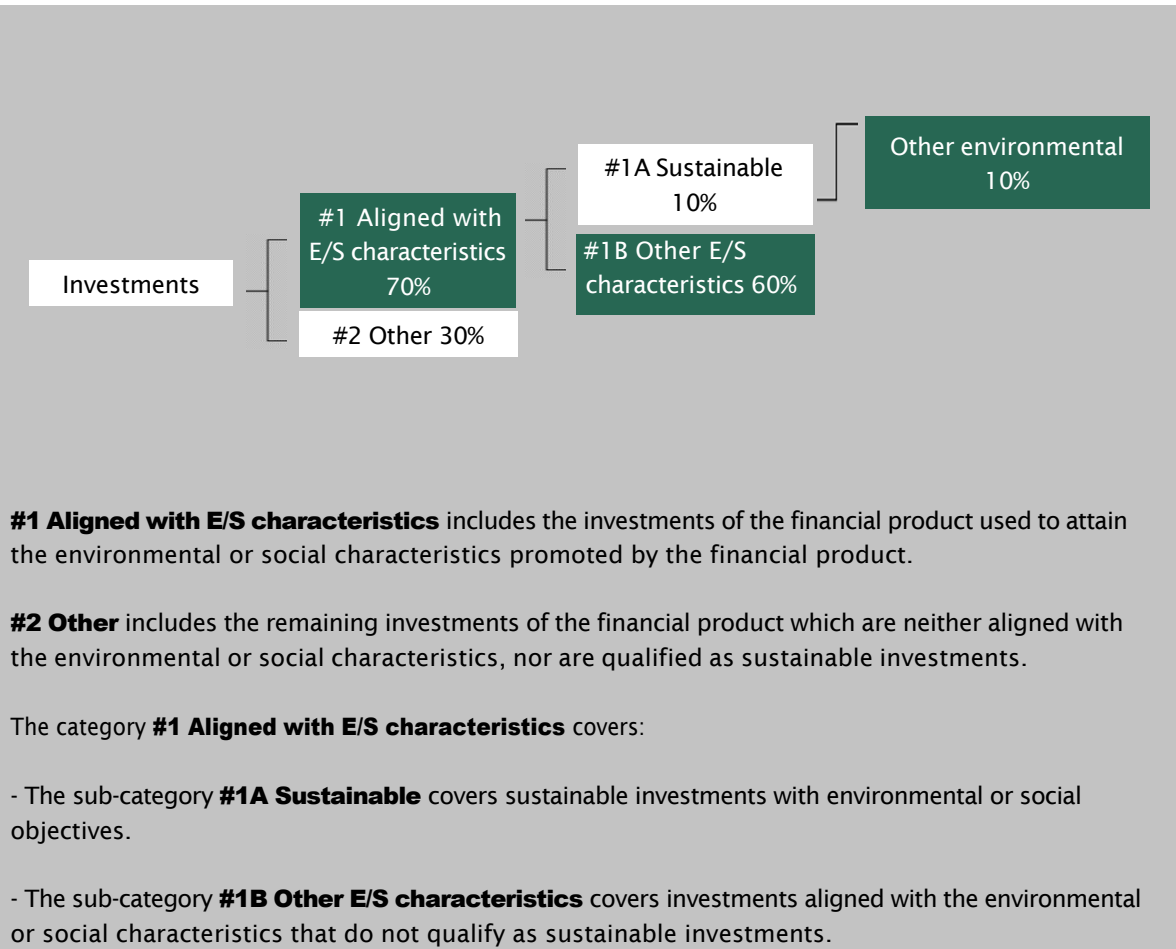
The Product intends to be at least 70% invested in sovereign and corporate securities which integrate of ESG and climate data to increase the ESG profile of the Index and mitigate the risk of climate change compared to its Parent benchmark.

Of this, a minimum of 10% will be invested in sustainable investments with an environmental objective.

The "other" is expected to be for securities that are securitised debt and government related securities, cash, passive share class hedging and other ancillary purposes.

Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.



How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?

The Product uses derivatives for managing broad market exposure. Derivatives are not used to attain the environmental or social characteristics of the Product and are not subject to any minimum safeguards.



To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

The Product presently intends to invest 0% of its assets in investments that contribute to environmentally sustainable economic activities in accordance with the Taxonomy Regulation.

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

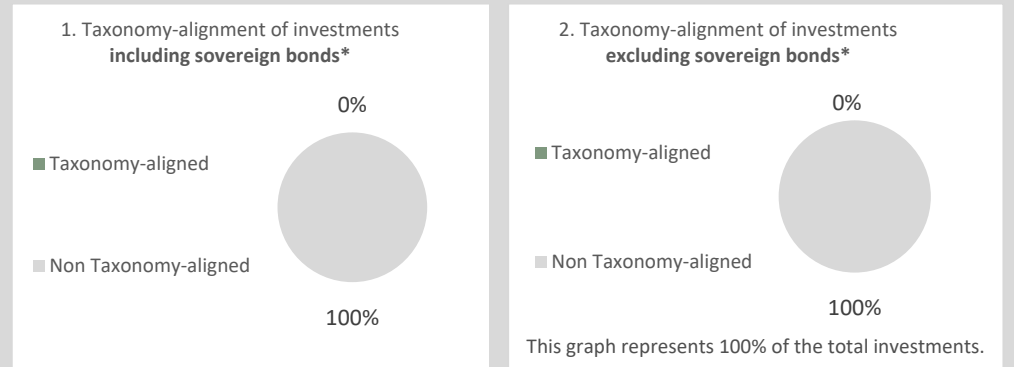
- Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy¹?

Yes:

In fossil gas In nuclear energy

No


The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.



* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures.

What is the minimum share of investments in transitional and enabling activities?

This is not applicable as the Product presently intends to invest 0% of its assets in investments that contribute to environmentally sustainable economic activities in accordance with the Taxonomy Regulation, which includes 0% of its assets in enabling activities and 0% of its assets in transitional activities towards climate change mitigation.

 are sustainable investments with an environmental objective **that do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.



What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy?

0% of the Product sustainable investments commitment is expected to be aligned with the EU Taxonomy.



What is the minimum share of socially sustainable investments?

The Product is not targeting socially sustainable investments hence anticipates 0% investments in socially sustainable investments.



What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?

Securitised debt and government related securities, cash, passive share class hedging and other ancillary purposes are the only investment types categorised as ‘other’ and none are aligned with environmental or social characteristics, nor qualify as sustainable investments.

¹ Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change (“climate change mitigation”) and do not significantly harm any EU Taxonomy objective - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.



Reference benchmarks are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

The Product is managed against the Solactive Global Bond 1-5 Years ESG Climate Index which integrates ESG and climate data into the sovereign and corporate sectors of the portfolio to increase the ESG profile and mitigate the risk of climate change compared to its parent benchmark; Solactive Broad Bond Index (the "Parent Index").

How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?

The Index is rebalanced monthly based on the latest available ESG metrics. We evaluate the ESG criteria with regular reviews to ensure that it continues to be aligned with each of the environmental or social characteristics promoted by the Product.

In addition, the NT Custom ESG screening criteria is a list of companies to be excluded from the investment universe and is reviewed on a quarterly basis in the February, May, August and November Index Reviews of the Parent Index.

For some securities, such data may not be published by the end of the month preceding the Index Review. For such securities, the data provider will use ESG data published after the end of month, when available. We evaluate the ESG criteria with regular reviews to ensure that it continues to be aligned with each of the environmental or social characteristics promoted by the Product.

How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?

Alignment of the investment strategy is ensured through the codification of the Index methodology which incorporates the various binding ESG criteria. This means that the Index applies the negative screens to the corporate sector of the portfolio, integrates the ESG scores to the sovereign and corporate sectors of the portfolio to increase the ESG profile and applies the carbon reduction targets to sovereign and corporate sectors of the portfolio; compared to the parent benchmark.

In addition, investment guidelines and restrictions are coded in our order management system to enable pre and post-trade monitoring.

How does the designated index differ from a relevant broad market index?

The Product is managed against the Solactive Global Bond 1-5 Years ESG Climate Index.

The Index integrates ESG and climate data into the sovereign and corporate sectors of the portfolio to increase the ESG profile and mitigate the risk of climate change compared to its parent benchmark.

Where can the methodology used for the calculation of the designated index be found?

The methodology used for the designated Index can be found [here](#). Please search by benchmark name.



Where can I find more product specific information online?

More specific information regarding the Product can be found [here](#).